

# EXHIBIT 19

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

\_\_\_\_\_  
UNITED STATES, ) 1:23-cv-00108-LMB-JFA  
et al., )  
)  
Plaintiffs, )  
)  
vs. )  
)  
GOOGLE LLC, )  
)  
Defendant. )  
\_\_\_\_\_)

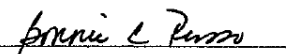
VIDEOTAPED DEPOSITION OF  
LARA STOTT  
September 18, 2023  
9:33 a.m.

Reported by: Bonnie L. Russo  
Job No. 6097869

<p style="text-align: right;">Page 2</p> <p>1 Videotaped Deposition of Lara Stott held at:</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6 Paul Weiss Rifkind Wharton &amp; Garrison, LLP</p> <p>7 2001 K Street, N.W.</p> <p>8 Washington, D.C.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18 Pursuant to Notice, when were present on behalf</p> <p>19 of the respective parties:</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES (CONTINUED):</p> <p>2</p> <p>3 Also Present:</p> <p>4 Captain Michael Ellis, Deputy Staff Advocate,</p> <p>5 Air Force Recruiting</p> <p>6 Lieutenant Grant Wahlquist, Air Force</p> <p>7 Commercial Law, Field Support Center</p> <p>8 Orson Braithwaite, Videographer</p> <p>9</p> <p>10 Also Present Via Remotely:</p> <p>11 Katherine Clemons, DOJ</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 On behalf of the Plaintiffs:</p> <p>4 MARK H.M. SOSNOWSKY, ESQUIRE</p> <p>5 RACHEL ZWOLINSKI, ESQUIRE</p> <p>6 ALVIN CHU, ESQUIRE</p> <p>7 UNITED STATES DEPARTMENT OF JUSTICE</p> <p>8 450 Fifth Street, N.W.</p> <p>9 Washington, D.C. 20530</p> <p>10 mark.sosnowsky@usdoj.gov</p> <p>11 rachel.zwolinski@usdoj.gov</p> <p>12 alvin.chu.liu@usdoj.gov</p> <p>13</p> <p>14 On behalf of the Defendant:</p> <p>15 HEATHER MILLIGAN, ESQUIRE</p> <p>16 MARTHA L. GOODMAN, ESQUIRE</p> <p>17 PAUL, WEISS, RIFKIND, WHARTON &amp;</p> <p>18 GARRISON, LLP</p> <p>19 2001 K Street, N.W.</p> <p>20 Washington, D.C. 20006</p> <p>21 hmilligan@paulweiss.com</p> <p>22 mgoodman@paulweiss.com</p>	<p style="text-align: right;">Page 5</p> <p>1 I N D E X</p> <p>2 EXAMINATION OF LARA STOTT PAGE</p> <p>3 BY MS. MILLIGAN 9</p> <p>4</p> <p>5 EXHIBITS</p> <p>6 Exhibit 118 LinkedIn Profile of 15</p> <p>7 Lara Stott</p> <p>8 Exhibit 119 E-Mail Chain 36</p> <p>9 dated 9-14-22</p> <p>10 USAF-ADS-0000860595-602</p> <p>11 Exhibit 120 Article entitled 37</p> <p>12 "Recruiting is hard.</p> <p>13 these YouTubers may have</p> <p>14 cracked the code"</p> <p>15 Exhibit 121 E-Mail Chain 86</p> <p>16 dated 6-14-22</p> <p>17 Attachment</p> <p>18 USAF-ADS-0000861537-609</p> <p>19 Exhibit 122 E-Mail Chain 122</p> <p>20 dated 9-18-22</p> <p>21 Attachment</p> <p>22 USAF-ADS-0000001422-476</p>

<p style="text-align: right;">Page 6</p> <p>1 EXHIBITS (CONTINUED):</p> <p>2</p> <p>3 Exhibit 123 E-Mail Chain 153</p> <p>4 dated 9-19-22</p> <p>5 Attachment</p> <p>6 USAF-ADS-0000418778-810</p> <p>7 Exhibit 124 E-Mail Chain 185</p> <p>8 dated 12-16-22</p> <p>9 Attachment</p> <p>10 USAF-ADS-0000785936-960</p> <p>11 Exhibit 125 E-Mail Chain 216</p> <p>12 dated 8-2-22</p> <p>13 Attachment</p> <p>14 USAF-ADS-0000005724-787</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 (Exhibits bound separately.)</p>	<p style="text-align: right;">Page 8</p> <p>1 Counsel will now state their</p> <p>2 appearances and affiliations for the record.</p> <p>3 MS. MILLIGAN: Heather Milligan with</p> <p>4 the law firm Paul, Weiss, Rifkind, Wharton &amp;</p> <p>5 Garrison on behalf of Google LLC.</p> <p>6 MS. GOODMAN: Martha Goodman from</p> <p>7 Paul Weiss on behalf of Google.</p> <p>8 MR. SOSNOWSKY: Mark Sosnowsky with</p> <p>9 the Department of Justice on behalf of the</p> <p>10 United States and the air force.</p> <p>11 MS. ZWOLINSKI: Rachel Zwolinski on</p> <p>12 behalf of the United States.</p> <p>13 MR. CHU: Alvin Chu on behalf of the</p> <p>14 United States.</p> <p>15 CAPTAIN ELLIS: Captain Mike Ellis,</p> <p>16 air force recruiting service.</p> <p>17 LIEUTENANT WAHLQUIST: Lieutenant</p> <p>18 Grant Wahlquist, air force, commercial law</p> <p>19 field support center.</p> <p>20 THE VIDEOGRAPHER: Thank you.</p> <p>21 Will the court reporter please swear</p> <p>22 in the witness.</p>
<p style="text-align: right;">Page 7</p> <p>1 PROCEEDINGS</p> <p>2 (9:33 a.m.)</p> <p>3</p> <p>4 THE VIDEOGRAPHER: Good morning.</p> <p>5 We are going on the record at 9:33</p> <p>6 a.m. on September 18, 2023.</p> <p>7 Please note that the microphones are</p> <p>8 sensitive and may pick up whispering and</p> <p>9 private conversations. Please mute your phones</p> <p>10 at this time. Audio and video recording will</p> <p>11 continue to take place unless all parties agree</p> <p>12 to go off the record.</p> <p>13 This is Media Unit 1 of the</p> <p>14 video-recorded deposition of Ms. Lara Stott in</p> <p>15 the matter of United States, et al. versus</p> <p>16 Google LLC filed in the United States District</p> <p>17 Court, Eastern District of Virginia, Alexandria</p> <p>18 Division, Case No. 1:23-cv-00108-LMB-JFA.</p> <p>19 My name is Orson Braithwaite</p> <p>20 representing Veritext Legal Solutions, and I am</p> <p>21 the videographer. The court reporter is Bonnie</p> <p>22 Russo from the firm Veritext Legal Solutions.</p>	<p style="text-align: right;">Page 9</p> <p>1 LARA STOTT,</p> <p>2 being first duly sworn, to tell the truth, the</p> <p>3 whole truth and nothing but the truth,</p> <p>4 testified as follows:</p> <p>5 EXAMINATION BY COUNSEL FOR DEFENDANT</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. Hi. Nice to meet you.</p> <p>8 Could you state your name for the</p> <p>9 record.</p> <p>10 A. It's Lara Stott.</p> <p>11 Q. Okay. And the pronunciation is</p> <p>12 Stott?</p> <p>13 A. Yes.</p> <p>14 Q. Great. So my name is Heather</p> <p>15 Milligan, and I'm with the law firm Paul Weiss,</p> <p>16 and I represent Google.</p> <p>17 Have you ever been deposed before,</p> <p>18 Ms. Stott?</p> <p>19 A. No.</p> <p>20 Q. Okay. So just going to start with a</p> <p>21 few rules.</p> <p>22 I'm going to try to break roughly</p>

<p style="text-align: right;">Page 254</p> <p>1 MS. MILLIGAN: This is prior to</p> <p>2 outreach by counsel, so --</p> <p>3 MR. SOSNOWSKY: I understand that,</p> <p>4 but I'm -- well, I can still instruct her just</p> <p>5 because she has already asked several questions</p> <p>6 about the time line. Okay. She says when she</p> <p>7 was with somebody that reached out --</p> <p>8 MS. MILLIGAN: Or you can just give</p> <p>9 the -- instruct -- just give the instruction to</p> <p>10 the witness.</p> <p>11 MR. SOSNOWSKY: Okay. So I'm going</p> <p>12 to instruct you not to reveal privileged</p> <p>13 communications or information or activities</p> <p>14 that were done at the instruction of counsel</p> <p>15 that came from counsel.</p> <p>16 THE WITNESS: Okay. Then, no, I</p> <p>17 can't answer that question.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. Okay. So your only knowledge of --</p> <p>20 of the air force's involvement in this</p> <p>21 litigation came from counsel or communications</p> <p>22 that were done at the direction of counsel?</p>	<p style="text-align: right;">Page 256</p> <p>1 concerns with."</p> <p>2 My primary function is to make sure</p> <p>3 that we are executing an efficient marketing</p> <p>4 plan in order to achieve an end recruiting</p> <p>5 mission. So insomuch as any vendor would be</p> <p>6 performing or not performing, that's really</p> <p>7 what I am looking at.</p> <p>8 BY MS. MILLIGAN:</p> <p>9 Q. So you did not have specific</p> <p>10 concerns as to Google?</p> <p>11 MR. SOSNOWSKY: Objection to form.</p> <p>12 THE WITNESS: I don't recall any</p> <p>13 specific issues or challenges or concerns with</p> <p>14 respect specifically to Google. But, again, it</p> <p>15 would have been as a part of a broader</p> <p>16 marketing program in order to meet an end</p> <p>17 recruitment mission.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. And earlier you said that you were</p> <p>20 not worrying about the lawsuit on a day-to-day</p> <p>21 basis.</p> <p>22 Are you worrying about it at all?</p>
<p style="text-align: right;">Page 255</p> <p>1 That's a yes-or-no question.</p> <p>2 MR. SOSNOWSKY: Object to form.</p> <p>3 But you can answer that yes or no.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. MILLIGAN:</p> <p>6 Q. Prior to this lawsuit in your -- in</p> <p>7 your role at the air force, were you aware of</p> <p>8 any anticompetitive conduct on the part of</p> <p>9 Google affecting U.S. Air Force's advertising?</p> <p>10 MR. SOSNOWSKY: Objection to form.</p> <p>11 Foundation.</p> <p>12 THE WITNESS: No, I don't believe I</p> <p>13 was.</p> <p>14 BY MS. MILLIGAN:</p> <p>15 Q. Prior to this lawsuit, did you have</p> <p>16 any concerns that Google was engaging in</p> <p>17 anticompetitive conduct related to digital</p> <p>18 advertising?</p> <p>19 MR. SOSNOWSKY: Objection to form.</p> <p>20 Foundation.</p> <p>21 THE WITNESS: Again, I just -- I</p> <p>22 want to be clear when you use words like "have</p>	<p style="text-align: right;">Page 257</p> <p>1 MR. SOSNOWSKY: Objection to form.</p> <p>2 THE WITNESS: Am I worrying about a</p> <p>3 lawsuit at all; is that what you're asking?</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. Yeah. Yes.</p> <p>6 MR. SOSNOWSKY: Same objections.</p> <p>7 THE WITNESS: No. Again, I have</p> <p>8 such a long list of things to do that this is</p> <p>9 not high on that priority list.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. Prior to this lawsuit -- sorry.</p> <p>12 Strike that.</p> <p>13 Where on the priority list is it?</p> <p>14 MR. SOSNOWSKY: Objection to form.</p> <p>15 THE WITNESS: Well down below all of</p> <p>16 those other things that get us to meeting</p> <p>17 mission requirements and any other special</p> <p>18 projects that I get assigned to in order to</p> <p>19 make things at air force recruitment service</p> <p>20 marketing work better.</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. And earlier we mentioned</p>

<p style="text-align: right;">Page 266</p> <p>1 THE VIDEOGRAPHER: The time is 4:42</p> <p>2 p.m. We are off the record.</p> <p>3 (Whereupon, the proceeding was</p> <p>4 concluded at 4:42 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 268</p> <p>1 Mark Sosnowsky, Esq.</p> <p>2 mark.sosnowsky@usdoj.gov</p> <p>3 September 19, 2023</p> <p>4 RE: United States, Et Al v. Google, LLC</p> <p>5 9/18/2023, Lara Stott (#6097869)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 erratas-cs@veritext.com</p> <p>16</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 267</p> <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, Bonnie L. Russo, the officer before</p> <p>3 whom the foregoing deposition was taken, do</p> <p>4 hereby certify that the witness whose testimony</p> <p>5 appears in the foregoing deposition was duly</p> <p>6 sworn by me; that the testimony of said witness</p> <p>7 was taken by me in shorthand and thereafter</p> <p>8 reduced to computerized transcription under my</p> <p>9 direction; that said deposition is a true</p> <p>10 record of the testimony given by said witness;</p> <p>11 that I am neither counsel for, related to, nor</p> <p>12 employed by any of the parties to the action in</p> <p>13 which this deposition was taken; and further,</p> <p>14 that I am not a relative or employee of any</p> <p>15 attorney or counsel employed by the parties</p> <p>16 hereto, nor financially or otherwise interested</p> <p>17 in the outcome of the action.</p> <p>18</p> <p>19 </p> <p>20 Notary Public in and for</p> <p>21 the District of Columbia</p> <p>22 My Commission expires: August 14, 2025.</p>	<p style="text-align: right;">Page 269</p> <p>1 United States, Et Al v. Google, LLC</p> <p>2 Lara Stott (#6097869)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 PAGE____ LINE____ CHANGE_____</p> <p>20 _____</p> <p>21 REASON_____</p> <p>22 _____</p> <p>23 _____</p> <p>24 Lara Stott Date _____</p> <p>25</p>